

REMARKS

Reconsideration and allowance of the subject application are respectfully requested. Claims 1-28 and 53-63 are now pending. In this Reply, Applicants have amended independent claims 1, 15, 53, and 57; have cancelled claims 29-52 without prejudice or disclaimer; and have added new dependent claims 58-63.

Interview

Applicants appreciate the opportunity granted to conduct a telephonic interview on October 11, 2005. During this interview, Applicants emphasized what they consider significant differences between the present invention and technical aspects of the X.509 Public Key Infrastructure described in the "Housley et al." document. The amendments presented herein are believed to be consistent with the features emphasized during the interview. Furthermore, in an effort to expedite prosecution, Applicants have cancelled claims 29-52 without prejudice or disclaimer.

Prior Art Rejections

1. **Section 102 Rejection: Housley et al.**

Claims 1-3, 7-17, 21-31, 53, 56, and 57 stand rejected under 35 U.S.C. § 102 as allegedly being anticipated by the document by Housley et al. titled "Internet X.509 Public Key Infrastructure Certificate and CRL Profile" (hereinafter "Housley"). This rejection, insofar as it pertains to the presently pending claims, is respectfully traversed.

Independent claim 1 recites a method for providing assurance that an electronic pseudonym belongs to a member of a particular organization. The method of claim 1, as amended, comprises: registering the organization with an authentication authority; distributing a membership token from the authentication authority to the organization; distributing the membership token to the member; registering the pseudonym with the authentication authority; and associating the pseudonym with the organization using the membership token to establish a relationship between the pseudonym and membership in the organization. This association enables a user of the pseudonym to communicate in an electronic forum or community as an authorized member of the organization while protecting the user's identity from other

participants in the electronic forum or community. Claim 1 specifies that other participants in the electronic forum or community are able to validate that the user of the pseudonym is a member of the organization via the authentication authority, and that the membership token is used to establish the relationship between the pseudonym and membership in the organization for various electronic forums or communities, such that the user of the pseudonym is able to communicate as an authorized member of the organization across multiple electronic forums or communities.

Thus, according to the invention of claim 1, the user is able to associate a pseudonym with membership in an organization and communicate in an electronic forum or community as an authorized member of the organization while protecting the user's identity from the other participants in the electronic forum or community. Furthermore, the method of claim 1 enables other participants in the electronic forum or community to validate that the user of the pseudonym is a member of the organization via the authentication authority. Furthermore, the pseudonym-membership association is usable in various electronic forums or communities, such that the user of the pseudonym is able to communicate as an authorized member of the organization across multiple electronic forums or communities.

Housley describes a standardized protocol, the X.509 Public Key Infrastructure (PKI), in which "certificates" are issued by a certification authority to authenticate users in an internet environment. This authentication allows secure communication between users. The X.509 protocol, however, does not address the particular problem solved by the present invention, i.e., establishing and managing relationships between pseudonymous identities and electronic media to provide assurance that a particular user (associated with a pseudonym) claiming membership in an organization can be verified as communicating as a member of the organization.

According to MPEP § 2131, "a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in

the ... claims.” *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913 (Fed. Cir. 1989).

At least in view of the above, Applicants respectfully submit that Housley fails to anticipate claim 1 or any claim depending therefrom. Furthermore, independent claims 15, 53, and 57 define over Housley based on similar reasoning set forth above with regard to independent claim 1.

In view of the above, Applicants respectfully request reconsideration and withdrawal of the Examiner’s rejection under 35 U.S.C. § 102.

2. Section 103 Rejection: Housley et al. – Grantges, Jr.

Claims 4-7 and 18-20 stand rejected under 35 U.S.C. § 103 as allegedly being unpatentable over Housley in view of Grantges, Jr. (U.S. Patent No. 6,324,648, hereinafter “Grantges”). This rejection, insofar as it pertains to the presently pending claims, is respectfully traversed.

As set forth on pages 6-7 of the Office Action, the Examiner relies on Grantges as allegedly teaching incremental features of the above-listed dependent claims. Applicants respectfully submit, however, that the Examiner’s reliance on Grantges fails to make up for the deficiencies of Housley discussed above with respect to independent claims 1 and 15. Consequently, the asserted combination (assuming these references may be combined, which Applicants do not admit) fails to establish *prima facie* obviousness of any pending claim.

In view of the above, Applicants respectfully request reconsideration and withdrawal of the Examiner’s rejection under 35 U.S.C. § 103.

Conclusion

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact the undersigned at the telephone number below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

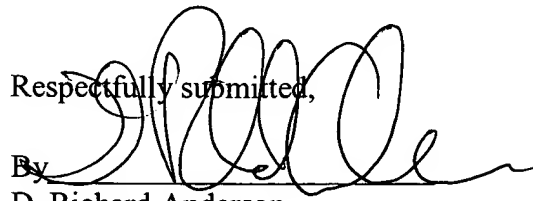
Application No. 09/897,473
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Reply to Office Action of July 26, 2005

Docket No.: 4361-0106P

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§1.16 or 1.17; particularly, extension of time fees.

Dated: October 26, 2005

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D. Anderson', written over a horizontal line.

By D. Richard Anderson

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